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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

In re KENVUE INC. SECURITIES
LITIGATION

This document relates to: ALL CASES

Civil Action Master File No.
3:23-cv-20998-ZNQ-JBD

Honorable Zahid N. Quraishi
Honorable J. Brendan Day

**STIPULATION AND SCHEDULING
ORDER SETTING DEADLINES FOR
FILING A CONSOLIDATED
COMPLAINT AND BRIEFING ANY
MOTION(S) TO DISMISS**

WHEREAS, on January 3, 2024, the Court entered a Stipulation and Scheduling Order providing, among other things, that by January 11, 2024, Defendants and Lead Plaintiff (collectively, the “Parties”) shall confer and jointly submit a proposed schedule for Lead Plaintiff to file a consolidated complaint and for Defendants to answer or otherwise respond, including a briefing schedule with respect to any anticipated dispositive motion (Dkt. No. 35);

WHEREAS, the Parties have conferred regarding a proposed schedule;

WHEREAS, given the complexity of the issues involved in this consolidated securities class action, the need for coordination between the twenty-four Defendants and their multiple


counsel, and taking into account the respective schedules of the Parties and their counsel, as well as similar scheduling orders entered in other securities class actions.

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the Parties, through their counsel and subject to Court approval:

1. Lead Plaintiff shall have until **March 12, 2024** to file a Consolidated Complaint;
2. Defendants shall have until **May 13, 2024** to answer or otherwise respond to the Consolidated Complaint;
3. Lead Plaintiff shall have until **July 12, 2024** to respond to any motion(s) to dismiss the Consolidated Complaint; and
4. Defendants shall have until **August 26, 2024** to reply in support of any motion(s) to dismiss the Consolidated Complaint.

GRANTED. Given the protracted briefing schedule, the parties are to refrain from filing their briefs on the deadlines set forth above. They are instead to serve their briefs on each other on those dates, and to file all briefs, together with a notice of motion, on the deadline to file replies.

Dated: January 10, 2024



Hon. Zahid N. Quraishi
United States District Judge

We hereby consent to the form and entry of the within stipulation and scheduling order setting deadlines for filing a consolidated complaint and briefing any motion(s) to dismiss.

Dated: January 9, 2024

/s/ Donald A. Ecklund

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Dated: January 9, 2024

/s/ David R. Kott

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Dated: January 9, 2024

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